

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re

Chapter 11

Seacrest Equities LLC

Case no. 16-43956

Debtor.

**SUPPLEMENTAL AFFIDAVIT**

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STATE OF NEW YORK )

)ss.:

COUNTY OF NEW YORK )

Mark A. Frankel, being duly sworn, deposes and says:

1. I am a member of the firm of Backenroth Frankel & Krinsky, LLP ("BFK"), which maintains an office for the practice of law at 800 Third Avenue, New York, New York 10022. I am fully familiar with the facts stated, and make this supplemental affidavit to support the application to retain BFK as counsel to the above-captioned debtor (the "Debtor").

2. Randall Funding LLC is an investment entity controlled by Lorenza Deluca that invests in distressed debt. In this case, Randall Funding is a 51% equity holders and a creditor holding a wholly under-secured \$830,000 lien claim.

3. On August 5, 2016, BFK filed a lift stay motion for Randall Funding in this Court the Chapter 13 case of Miranda Chu, case no. 16-43090. On September September

13, 2016, shortly after the September 1, 2016 filing of this case, Randall Funding settled with Ms. Chu and withdrew its motion.

4. The Chu case was and is unrelated to this case except for Randall Funding being a party in interest in both.

5. Mr. Deluca consented to BFK's retention when the Debtor retained BFK. As indicated by the letter annexed hereto, Patricia Kveton, who holds a 49% membership, consents to BFK's retention as well.

s/Mark Frankel

Sworn to before me this  
December 19, 2016

s/Scott Krinsky  
Notary Public

**PATRICIA KVETON**  
**333 Sunset Avenue Apt 515**  
**Palm Beach, FL**

November 10, 2016

Mark Frankel, Esq.  
Backenroth, Frankel and Krinsky  
800 Third Avenue  
New York, NY 10120

Dear Mr Frankel:

I acknowledge that you have been retained to represent Seacrest Equities LLC. You have disclosed to me your prior representation of Randall Funding LLC the holder of an unsatisfied judgment against me and my husband Robert V. Cattani which is a lien against the property at 12 Seacrest Drive, Lloyd Harbor, NY now owned by Seacrest Equities LLC. . I acknowledge that you have advised me that you will not act as an attorney for me individually and that I further acknowledge that you have advised me that your representation may constitute a conflict of interest. Please be advised that I hereby waive any conflict of interest that may exist and I consent to your retention to act as attorney for Seacrest Equities LLC.

Sincerely,

  
Patricia Kveton